

# EXHIBIT 1

STATE OF SOUTH CAROLINA	)	IN THE COURT OF COMMON PLEAS
	)	EIGHTH JUDICIAL CIRCUIT
COUNTY OF GREENWOOD	)	CIVIL ACTION NO.: 2022-CP-24-_____
	)	
	)	
Sandra Reese and	)	
Norman Reese,	)	
	)	
Plaintiffs,	)	
	)	
vs.	)	SUMMONS
	)	
Dollar Tree Stores, Inc. f/k/a Only	)	
One Dollar, Inc.,	)	
	)	
Defendant.	)	
_____	)	

**TO THE DEFENDANTS ABOVE NAMED:**

**YOU ARE HEREBY SUMMONED AND REQUIRED** to answer the Complaint in this action, a copy of which is herewith served upon you, and to serve a copy of your Answer to the said Complaint on the subscriber at his offices, 109 West Court Avenue, P.O. Box 457, Greenwood, South Carolina, within thirty (30) days after the service hereof, exclusive of the date of such service, and if you fail to answer the Complaint within the time aforesaid, judgment by default will be rendered against you for the relief demanded in the Complaint.

**NICHOLSON, MEREDITH & ANDERSON, LLC**

s/W.H. Nicholson, IV  
W.H. Nicholson, IV  
W.H. Nicholson, III  
Attorneys for Plaintiffs  
109 W. Court Ave.  
P. O. Box 457  
Greenwood, SC 29648  
(864) 229-7241

January 4, 2022  
Greenwood, South Carolina

1. Plaintiffs are citizens and residents of the County of Greenwood, State of South Carolina.
2. Plaintiffs were married on February 13, 1988, and the Plaintiffs continue to be married.
3. Upon information and belief, Defendants are the franchisor, franchisee and/or owners of a property and business operating at 5252 Highway 72 Bypass in the County of Greenwood, State of South Carolina.
4. Upon information and belief, Defendant Dollar Tree Stores, Inc. formerly known as Only One Dollar, Inc. is a Virginia Corporation duly authorized to transact business in the State of South Carolina.
5. This Court has jurisdiction of the parties hereto and the subject matter of this action.
6. On or about January 7, 2019 at approximately 12:00 P.M., Plaintiffs Sandra Reese and Norman Reese were patrons of the Defendants' business. Plaintiff Sandra Reese was pushing a shopping cart through the Defendants' business, when she encountered a liquid hazard on the floor.

7. An employee of the Dollar Tree Store admitted to placing a newspaper on the liquid spill but not cleaning the spill.
7. As Plaintiff Sandra Reese was shopping and pushing the shopping cart, the shopping cart ran over a liquid hazard in the floor, causing the shopping cart to slide and Plaintiff Sandra Reese to subsequently fall on the right side of her body injuring her right knee, right upper extremity, right lower extremity, left shoulder, and head.
8. Following the incident, Plaintiff Norman Reese drove Plaintiff Sandra Reese to Express Medical Care in Greenwood, South Carolina.
9. The day following the incident, Plaintiff Sandra Reese presented to Self Regional Healthcare Emergency Room with continued headaches and pain.
10. Following Plaintiff Sandra Reese's treatment at Self Regional Healthcare Emergency Room, she treated with Advanced Neurosurgical Associates, Orthopaedic Associates of the Lakelands, and Optimum Life Center.
11. Defendants owed a duty of utmost care to discover any risk or danger to patrons on the premises and to warn patrons of the premises of any unsafe condition which may cause bodily injury.
12. The Defendants were negligent, grossly negligent, careless, reckless, willful and wanton in at least one or more, or all of the following particulars, for which negligent acts Defendants are liable:
  - a) In failing to keep the premises in a reasonably safe condition, including but not limited to, adequately marking slip hazards and cleaning after spills;
  - b) In failing to provide an adequate warning of hazards on the floor;
  - c) In failing to inspect the premises in order to ascertain the safety of the area;

- d) Upon discovery of an unsafe condition, in failing to remedy it and/or in failing to correct or warn individuals of the dangerous condition caused by its failure to remedy the condition;
  - e) In failing to maintain the premises in a reasonably safe condition for its customers, employees, and guests;
  - f) In failing to exercise due care;
  - g) and by otherwise, being negligent, grossly negligent, careless, reckless, willful and wanton.
13. As a direct and proximate cause of the aforesaid negligent, grossly negligent, careless, reckless, willful and wanton acts and conduct of the Defendants as hereinabove more particularly set forth, Plaintiff Sandra Reese suffered great physical harm and injury, which caused Plaintiff Sandra Reese to undergo much physical pain, suffering, and emotional distress has caused, and will in the future cause, Plaintiff Sandra Reese to have to spend money for medical services and pharmaceutical costs, has impaired Plaintiff Sandra Reese's enjoyment of life, and has caused Plaintiff Sandra Reese permanent impairment to her body.
14. That as a result of the aforesaid negligent, grossly negligent, careless, reckless, willful and wanton acts and conduct of the Defendants as hereinabove more particularly set forth, the Plaintiffs were caused to suffer, and will continue to suffer in the future, loss of consortium, loss of society, affection, assistance, and conjugal fellowship, all to the detriment of their marital relationship.
15. The Plaintiffs are informed and believe that because of the gross negligence and recklessness of the Defendants, as hereinabove enumerated, the Plaintiffs are entitled to an

award of actual and punitive damages in an appropriate amount.

**WHEREFORE**, Plaintiffs pray the Court grant a jury trial, award judgment against the Defendants for actual and punitive damages in an amount to be determined by the trier of fact, and for such other and further relief as the Court deems just and proper.

**NICHOLSON MEREDITH & ANDERSON, LLC**

s/ W.H. Nicholson, IV

W.H. Nicholson, IV

W.H. Nicholson, III

Attorneys for Plaintiffs

P. O. Box 457

Greenwood, SC 29648

864-229-7241

January 4, 2022  
Greenwood, South Carolina



**Defendant.**

## AFFIDAVIT OF SERVICE

My commission expires: 09/24/2028





January 06, 2022

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**Recipient:**

Dollar Tree Stores, Inc., Corporation Service Company  
508 Meeting Street  
WEST COLUMBIA, SC, US, 29169

**Shipper:**

Haylea Carter, NICHOLSON MEREDITH & ANDERSON  
109 WEST COURT AVENUE  
FIRST FLOOR  
GREENWOOD, SC, US, 29646

**Reference**

Reese

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<b>Recipient:</b>	Dollar Tree Stores, Inc., Corporation Service Company 500 Volvo Parkway CHESAPEAKE, VA, US, 23320	<b>Shipper:</b>	Haylea Carter, NICHOLSON MEREDITH & ANDERSON 109 WEST COURT AVENUE FIRST FLOOR GREENWOOD, SC, US, 29646

**Reference** Reese

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